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UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF WASHINGTON

MARIA G. DAVILA-MARQUEZ and)	
ERNESTO MARQUEZ, wife and husband,)	
)	NO. CV-12-5059-LRS
Plaintiffs,)	
)	AGREED PROTECTIVE
vs.)	ORDER
)	
CITY OF PASCO, a municipal corporation;)	
and RYAN FLANAGAN and JANE DOE)	
FLANAGAN, husband and wife, and)	
ZACHARY FAIRLEY and JANE DOE)	
FAIRLEY, husband and wife, and)	
ROBERT METZGER, Chief of Police of)	
the Pasco Police Department,)	
)	
Defendants.)	

Plaintiffs requested in discovery, from the City of Pasco, the “complete employment files for Officers Ryan Flanagan, Zachary Fairley, Anthony Haworth, Ben Majetich, and Robert Metzger.” Pasco does not believe the files will lead to

1 relevant information. Pasco will redact from the records the home addresses,
2 home phone numbers, and social security numbers of the officers, and withhold
3 from production private financial information and medical information. Pasco is
4 willing to produce the remaining portions of the files, provided a protective order
5 is entered concerning the confidentiality and use of the files.
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8 Plaintiffs requested in discovery, from the City of Pasco, any documents
9 pertaining to complaints or grievances involving the City of Pasco Police
10 Department in the last ten years. Pasco does not believe the documents will lead
11 to relevant information. Pasco is willing to produce a list of complaints, provided
12 a protective order is entered concerning the confidentiality and use of the files.
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15 Notwithstanding consenting to this order, plaintiffs reserve the right to later
16 question the validity of any redaction and any withholding of records. Plaintiffs
17 reserve the right to seek documents concerning complaints or grievances.
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19 Defendants reserve the right to seek a further protective order concerning
20 redactions, the withholding of records, and documents concerning complaints and
21 grievances.
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24 BASED upon the agreement of the parties and good cause,

25 IT IS HEREBY ORDERED that the parties' Motion For Entry of Agreed
26

1 Protective Order, ECF No. 12, is GRANTED, and defendant City of Pasco shall
2 produce the employment files of Ryan Flanagan, Zachary Fairley, Anthony
3 Haworth, Ben Majetich, and Robert Metzger, subject to the redactions listed above
4 and the withholding of personal financial and medical information. Pasco shall
5 provide plaintiffs a list identifying the records withheld. Pasco shall produce a list
6 of complaints and grievances involving Pasco Police Department officers in the
7 last ten years.
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11 IT IS FURTHER ORDERED that plaintiffs shall keep the employment files
12 and list of complaints and grievances confidential and not distribute them to any
13 third parties unrelated to this lawsuit. The files shall not be used for any purpose
14 other than use in this lawsuit. Upon the completion of this litigation, plaintiffs
15 shall destroy their copies of the files.
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17

18 DATED this 13th day of December, 2012.

19
20 *s/Lonny R. Suko*

21 _____
22 LONNY R. SUKO
23 United States District Judge
24
25
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1 PRESENTED BY:
2 LEAVY, SCHULTZ, DAVIS & FEARING, P.S.
3 Attorneys for Defendants

4 /s/ George Fearing
5 GEORGE FEARING #12970
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12 Approved:
13 Notice of Presentment Waived:
14 TAMAKI LAW OFFICES
15 Attorneys for Plaintiffs

16 /s/ Vito R. De La Cruz
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